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Office of Secretary

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May 5, 1997

BY HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

Re: Comments of Metro Broadcasters-Texas, Inc.
MM Docket No. 97-91; RM-8854
Lewisville, Gainesville, Robinson, Corsicana,
Corsicana, Jacksboro, and Mineral Wells, Texas

Dear Mr. Caton:

Transmitted herewith on behalf of Metro Broadcasters-Texas, Inc., are an original and four copies of its Comments and Counterproposal filed in the above-captioned proceeding in support of the substitution of Channel 237C2 for Channel 237C3 at Howe, Texas, in lieu of the proposal set forth in the *Notice of Proposed Rule Making and Order to Show Cause*, DA 97-489 (released March 14, 1997).

Should any questions arise concerning these comments, please communicate directly with this office.

Very truly yours,



Andrew S. Kersting
Counsel for
Metro Broadcasters-Texas, Inc.

Enclosures
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BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

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Federal Communications Commission
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In the Matter of)

)
)
Amendment of Section 73.202(b),
Table of Allotments,
FM Broadcast Stations
(Lewisville, Gainesville, Robinson,
Corsicana, Jacksboro, and
Mineral Wells, Texas)

) MM Docket No. 97-91
) RM-8854
)
)
)
)

To: Chief, Allocations Branch

COMMENTS AND COUNTERPROPOSAL

Metro Broadcasters-Texas, Inc. ("Metro"), licensee of Station KHYI(FM), Howe, Texas, by counsel, hereby submits its comments and counterproposal in response to the Commission's *Notice of Proposed Rule Making and Order to Show Cause*, DA 97-489 (released March 14, 1997) ("NPRM"), in the above-captioned proceeding. As set forth below, Metro currently has a proposal pending in MM Docket No. 97-26 (RM-8968) which is incompatible with the proposal set forth in the *NPRM*. Accordingly, Metro respectfully requests that the following change be made to Section 73.202(b) of the Commission's rules in lieu of the change proposed in the *NPRM*:

Channel No.

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Detroit, Texas	- - -	238C2 or 238C3 or 238A
Howe, Texas	237C3	237C2
Hugo, Oklahoma	238C2	294C2
Jacksboro, Texas	299A	299A

As set forth in the *NPRM*, Heftel Broadcasting Corporation ("Heftel")¹ currently has a proposal pending to amend the FM Table of Allotments by substituting Channel 300C1 for Channel 300C2 at Gainesville, reallocating Channel 300C1 to Lewisville, Texas, and modifying its construction permit for Station KECS to specify operation on Channel 300C1 at Lewisville. In addition, Heftel proposes the substitution of Channel 300A for Channel 300C1 at Corsicana, Texas, the reallocation of Channel 300A to Robinson, Texas, and modification of its license for Station KICI to specify operation on Channel 300A at Robinson. In order to accommodate its proposed reallocations, Heftel also proposes the substitution of Channels 237A for Channel 299A at Jacksboro, Texas, and Channel 240C3 for Channel 240C1 at Mineral Wells, Texas. *NPRM* at ¶1.

The proposal set forth in the *NPRM* should not be adopted because Heftel has failed to protect the existing Channel 240C1 allotment at Mineral Wells, Texas. *See* 47 CFR §73.202(b); *Report and Order* in MM Docket No. 90-555, 7 FCC Rcd 1791 (1992). Although the construction permit to implement the Channel 240C1 upgrade at Mineral Wells expired on October 15, 1994, and was subsequently cancelled, the licensee's inability to implement the upgrade prior to the expiration of its construction permit was due to circumstances beyond the licensee's control. As demonstrated in the comments of Jerry Snyder and Associates ("JSA")² filed contemporaneously herewith, JSA's efforts to construct its Class C1 facilities were frustrated by the death of the property owner of JSA's proposed transmitter site, and the fact that his widow and son were unwilling to make the site available to JSA while the property was in the deceased's estate. JSA's efforts to find an alternative

¹ Heftel is the permittee of Station KECS, Channel 300C2, Gainesville, Texas, and licensee of Station KICI, Channel 300C1, Corsicana, Texas.

² JSA is the licensee of Station KYXS-FM, Mineral Wells, Texas.

site were unsuccessful. Nevertheless, after the estate sold the land to a local municipal water district, JSA entered into an agreement with the district for the use of a portion of the land for its original transmitter site. JSA also filed an application to construct its new Class C1 facility on November 25, 1996 (File No. BPH-961125IG), and that application currently remains pending. Therefore, because Heftel has failed to protect the existing allotment of Channel 240C1 at Mineral Wells in accordance with Section 73.207 of the Commission's rules, and Heftel's proposal is contingent upon the substitution of Channel 240C3 for 240C1 at Mineral Wells, the proposal set forth in the *NPRM* should not be adopted.

Furthermore, as indicated in the *NPRM*, the proposed substitution of Channel 300A for Channel 300C1 at Corsicana, Texas, and the reallocation of Channel 300A to Robinson, Texas, does not warrant a first local service preference because Robinson is located within the Waco Urbanized Area, and the proposed allotment of Channel 300A at Robinson would provide a city-grade signal to 70% of the Waco Urbanized Area. See *NPRM* at ¶4, citing, *inter alia*, *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988); *RKO General (KFRC)*, 5 FCC Rcd 3222 (1990). Therefore, for this additional reason, the proposal set forth in the *NPRM* should not be adopted.

Consistent with its pending counterproposal in MM Docket No. 97-26 (RM-89678) (the "Detroit proceeding"),³ Metro proposes, instead, that the Commission (i) allot either Channel 238C2, 238C3, or 238A to Detroit, Texas, (ii) substitute Channel 294C2 for Channel 238C2 at Hugo,

³ In MM Docket No. 97-26 (RM-8968), the Commission issued a *Notice of Proposed Rule Making*, 12 FCC Rcd 1810 (Chief, Allocations Branch 1997), in response to a petition for rulemaking filed by Great Plains Radiocasting ("Great Plains") seeking the allotment of Channel 294C2 to Detroit, Texas.

Oklahoma, and (iii) modify the license of Station KHYI, Howe, Texas, to specify operation on Channel 237C2 in lieu of Channel 237C3. In support of this request, the following is stated:

As demonstrated in the attached engineering exhibit, from an assumed transmitter site at the specified reference coordinates, there is an open area where Station KHYI's transmitter may be located that meets the minimum separation requirements with respect to all known licenses, construction permits, open allotments, pending applications, and pending rulemakings.⁴ The specified transmitter reference coordinates are located only 2.70 kilometers south-southwest of Howe which will enable Station KHYI to provide a city-grade signal to its community of license.

As also demonstrated in the attached engineering exhibit, Channel 238 can be allotted at Detroit in lieu of Channel 294C2 as either a Class C2, C3, or A facility, and will not conflict with Metro's proposal to upgrade Channel 237C3 at Howe to Class C2. The pending rulemaking petition filed in the Detroit proceeding by Great Plains, seeking the allotment of Channel 294C2 at Detroit, specifies a site restriction of 22 kilometers northwest of the community in order to avoid a short-spacing to Station KWSK(FM), Daingerfield, Texas. As shown in the attached engineering exhibit, however, Channel 238 can be allotted to Detroit as a Class C2 facility with a site restriction of only 7.68 kilometers east of the community's reference coordinates. Alternatively, Channel 238 can be allotted to Detroit at its center-city reference coordinates as either a Class C3 or A facility. See Engineering Statement, pp. 1-2. Metro respectfully submits that because Detroit has a 1990 Census

⁴ The proposed allotment of Channel 237C2 at Howe was short-spaced to a proposal to allot Channel 237A at Jacksboro, Texas. However, as indicated in the *NPRM* at ¶5, the Commission allotted Channel 299A at Jacksboro in lieu of Channel 237A, which meets the minimum separation requirements. See *Report and Order* in MM Docket No. 96-10, DA 96-2210 (released January 17, 1997).

population of only 706 persons, the allotment of a Class C2 facility is not necessary to provide adequate service to that community.⁵

As indicated above, Metro's proposal in the Detroit proceeding also seeks to substitute Channel 294C2 for the existing allotment of Channel 238C2 at Hugo, Oklahoma, upon which Station KITX(FM) is currently operating. The Commission has repeatedly held that the substitution of an existing station's channel serves the public interest where the substitution permits the provision of a new or expanded service at another community. *See Coleman, Sebewaing and Tuscola, Michigan*, 11 FCC Rcd 11286, 11287-88 (Chief, Allocations Branch 1996), citing *Marietta, Ohio and Ravenswood, West Virginia*, 2 FCC Rcd 4681 (Chief, Allocations Branch 1987); *Albany, New York et al.*, 2 FCC Rcd 4300 (Chief, Policy and Rules Div. 1987). Metro will reimburse the licensee of Station KITX(FM), Hugo, Oklahoma, for its reasonable and prudent costs associated with implementing the requested frequency change.

The attached engineering exhibit establishes that a grant of the alternative Channel 238C2 counterproposal would serve the public interest because it would bring a new service to a greater number of people in the Detroit area than Great Plains' proposal. Indeed, the 1 mV/m contour of the proposal set forth in the *Notice of Proposed Rule Making* in the Detroit proceeding encompasses 87,304 persons within an area of 8,577.3 square kilometers (sq. km). The 1 mV/m contour of the alternative counterproposal to allot Channel 238C2 at Detroit would cover 96,272 persons in an area consisting of 8,559.8 sq. km. *See Engineering Statement*, pp. 2-3. Moreover, although Great Plains' proposal would provide a fifth service to a narrow area encompassing approximately 170 persons

⁵ In contrast, the city of Howe, Texas, is an incorporated community with a 1990 U.S. Census population of 2,173. Howe has its own post office and zip code, as well as at least one bank. *Rand McNally Commercial Atlas & Marketing Guide*, p. 529 (127th ed. 1996).

and 12.9 sq. km, Metro's counterproposal would provide a fifth service to three separate areas covering 640 persons within a total area of 83.1 sq. km.⁶ *Id.* at 3.

Furthermore, the proposed modification of the allotment of Channel 237C3 to Channel 237C2 at Howe would enable Station KHYI to increase its 1 mV/m (60 dBu) contour, which presently covers a population of 254,212 persons and an area of 4,856.1 sq. km., to cover a population of 392,186 persons encompassing an area of 8,486.4 sq. km. This increase represents a gain of 137,974 persons and an area of 3,630.3 sq. km. There is no loss area from the proposed reference point. *Id.* at 4.

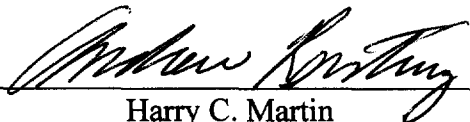
In the event Metro's counterproposal is granted and the FM Table of Allotments is amended to substitute Channel 237C2 for Channel 237C3 at Howe, Texas, Metro will file an application for a construction permit for the Class C2 facility, and, upon grant of its application, promptly construct the new facility.

WHEREFORE, in light of the foregoing, Metro Broadcasters-Texas, Inc. respectfully requests the Commission to GRANT this counterproposal, AMEND the FM Table of Allotments in accordance herewith, and MODIFY the license of Station KHYI, Howe, Texas, to specify operation on Channel 237C2 in lieu of Channel 237C3.

⁶ The Commission has long considered an area receiving five aural services to be well-served. *See, e.g., Georgetown and Millsboro, Delaware*, 11 FCC Rcd 14445, 14446 (Chief, Allocations Branch 1996); *Geneseo, Illinois and DeWitt, Iowa*, 11 FCC Rcd 11575, 11577 n. 4 (Chief, Allocations Branch 1996).

Respectfully submitted,

METRO BROADCASTERS-TEXAS, INC.

By: 
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Its Counsel

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May 5, 1997

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**ENGINEERING REPORT
COUNTER-PROPOSAL TO
DOCKET 97-91
RM-8854**

May 1997

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E. Harold Munn, Jr. & Associates, Inc.
Broadcast Engineering Consultants
Coldwater, MI 49036

ENGINEERING STATEMENT

In Support of a Counter-Proposal To MM Docket No. 97-91

The firm of E. Harold Munn, Jr. & Associates, Inc., was retained to prepare this Engineering Statement in support of a counter-proposal to MM Docket No. 97-91 (RM-8854) to amend 47 C.F.R. Section 73.202(b), the FM Table of Allotments.

The Commission has before it a proposal to amend the FM Table of Allotments, §73.202(b) under the above mentioned docket. The proposal seeks to substitute Channel 300C1 for Channel 300C2 at Gainesville, TX, reallocate Channel 300C1 to Lewisville, TX, modifying the construction permit of KECS to specify operation on Channel 300C1 at Lewisville. In addition, the rulemaking proposes the substitution of Channel 300A for Channel 300C1 at Corsicana, TX, the reallocation of Channel 300A to Robinson, TX and modification of the license of KICI to specify operation on Channel 300A at Robinson, TX. The Channel 300A substitution to Robinson is necessary to accommodate the Channel 300C1 substitution at Lewisville, TX. Finally, to accommodate these reallocations, the proposal requests the substitution of Channel 237A at Jacksboro, TX and substitution of Channel 240C3 at Mineral Wells, TX.

This counter-proposal requests that Channel 299A be retained at Jacksboro, TX to accommodate the changes proposed in MM Docket 97-26, RM-8968.

That proposal seeks to amend the Table to modify Channel 237C3, 95.3 MHz at Howe, Texas to Class C2 designation and reserve the channel for use by KHYI. A special reference point meeting the spacings of §73.207(b)(1)(2) is specified at NL 33°29'27"; WL 96°37'32". This special reference point is located 2.70 km to the south-southwest of the Howe, TX city reference point. A open area exists where a transmitter site may be located and provide 3.16 mV/m city grade service.

In addition, it proposed to change the Table of Allotments to substitute Channel 294C2 for Channel 238C2 at Hugo, Oklahoma, reserving this allocation for KITX. This is also a counter-proposal to MM Docket No. 97-26 (RM-8968) to add Channel 294C2 to Detroit, Texas. However, as shown below, Channel 238 can be used at Detroit either as a Class C2, C3 or A facility and not conflict with KHYI's Class C2 upgrade on Channel 237.

Employing a different special reference point at NL 33°39'32"; WL 95°11'00", Channel 238C2 can be allocated to Detroit rather than 294C2. This reference point is only 7.68 kilometers to the east of the city reference point. The proposal for Channel 294C2 is site restricted to 22 kilometers northwest of Detroit. Alternatively,

ENGINEERING STATEMENT

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In Support of a Counter-Proposal To MM Docket No. 97-91

this proposal would work from the Detroit city reference point as Channel 238C3 or Channel 238A. Due to the extremely small population of 706 persons from the 1990 Census in Detroit, TX, there is a question regarding whether a Class C2 channel is needed to serve that community.

Data contained in this report is responsive to the requirements of the Rules, as amended.

Figure 1 is a tabulation of present spacings from the city reference point. This tabulation shows a short-spacing to a proposal to add Channel 237A to Jacksboro, TX. RM-8799 has been adopted which added Channel 299A instead of Channel 237A. With the additional proposal to modify KITX, Hugo, OK, from Channel 238C2 to Channel 294C2, the reference point is fully spaced. Figure 2 is a pertinent portion of the computer study which demonstrates that, at the Howe, TX city reference point listed, and for the class of station proposed, all the required separations are fully met for the proposed allotment of Channel 237C2. Figure 3 shows a computer plot of the proposed FM transmitter open area for Channel 237C2 at Howe, TX.

Figure 4 is a tabulation of the pertinent portion of the computer study which demonstrates that Channel 294C2 meets all the spacings from the present KITX, Hugo, OK transmitter site. Channel 238C2 will be deleted from that community.

Figure 5 is a tabulation of the pertinent portion of the computer study which demonstrates that Channel 238C2 meets all the spacings from a special reference point for Detroit, TX.

Figure 6 is a tabulation of the pertinent portion of the computer study which demonstrates that Channel 238C3 meets all the spacings from the Detroit, TX city reference point.

Figure 7 is a tabulation of the pertinent portion of the computer study which demonstrates that Channel 238A meets all the spacings from the Detroit, TX city reference point.

Figure 8 is a map showing the 1 mV/m contour of the Detroit, TX allocation as proposed in RM-8968 on Channel 238C2 versus the same contour from this counter-proposal on Channel 294C2. The

ENGINEERING STATEMENT

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In Support of a Counter-Proposal To MM Docket No. 97-91

population in the 1 mV/m contour of RM-8968 would encompass 87,304 persons in an area of 8,577.3 Sq. Km. This counter-proposal's 1 mV/m contour would cover 96,272 persons in an area of 8,559.8 Sq. Km.

In addition to this showing, a study was made of the number of aural broadcast services existing in the proposed RM-8968 1 mV/m contour versus the 1 mV/m contour of this counter-proposal. Figure 9 is a map showing the 1 mV/m contour of RM-8968 and a depiction of the other AM and FM services provided to the area. Figure 10 is a tabulation of the stations shown in Figure 9. There is one area, on the northeast edge of the contour that has only 4 existing aural broadcast services. The proposal in RM-8968 would provide the 5th service to this area. Five aural broadcast services are considered adequate for any area in the country. Based on uniform distribution of population within each minor civil division in the 1990 Census data, 170 persons would be receiving this 5th service. The area that is delineated by this 5th service covers 12.9 Sq. Km.

Figure 11 is a map depicting the aural broadcast services to the 1 mV/m contour in this counter-proposal. Figure 12 is a tabulation of the pertinent stations that provide service to this contour area. Figure 11 shows that, again, the least amount of existing services to any area within the 1 mV/m contour is four (4). However, there are three separate areas where this occurs. The total population in the three areas where the counter-proposal will become the 5th aural broadcast service is 640 persons. These three areas cover a total of 83.1 Sq. Km. Note that some stations providing service, without eliminating gray area, have been omitted for improved map definition.

The existing facilities of the stations included in this report were determined by the use of currently updated copies of the FCC computer databases of AM and FM stations. The accuracy of the results of this study are understood to be limited to the accuracy of these databases. The FCC databases give no indication of licensed facilities which may be inoperative, construction permit facilities which may now be operating under program test authority (but have not yet been issued a license), facilities which may have been licensed since the last monthly update, or non-commercial stations operating either in the AM band or within the commercial portion of the FM band. Therefore, it is possible that some stations may have been included or excluded erroneously. However, unless otherwise indicated, all licensed facilities known to be inoperative and all known non-

ENGINEERING STATEMENT

Page 4

In Support of a Counter-Proposal To MM Docket No. 97-91

commercially licensed stations, as well as application and construction permit facilities, have been eliminated from consideration in this study. For AM stations, Map M-3 soil conductivity values and the authorized licensed transmitting facilities served as the basis for the computation of the predicted 0.5 mV/m groundwave contour in accordance with §73.183 of the FCC Rules. The distance to the contour was computed for seventy-two (72) equally spaced azimuths beginning with 0° True. For FM stations, the authorized Center of Radiation and ERP values were utilized to compute the predicted 1.0 mV/m (60 dBu) contour as provided in §73.313 of the Rules. The predicted FM contours shown in this report are based on the use of 36 equally spaced terrain radials beginning with 0° True.

Figure 13 is a map showing the present licensed coverage of KHYI versus proposed maximum Class C2 facilities from the special reference point. The present 1 mV/m (60 dBu) contour covers a population of 254,212 persons and an area of 4,856.1 Sq. Km. The proposed 1 mV/m (60 dBu) contour covers 392,186 persons and an area of 8,486.4 Sq. Km. From the proposed special reference point, there is a gain area with a population of 137,974 persons encompassing an area of 3,630.3 Sq. Km. There is no loss area from the proposed special reference point.

It is requested that 47 C.F.R. §73.202(b) be amended as follows.

<u>CITY, STATE</u>	<u>PRESENT</u>	<u>PROPOSED</u>
Detroit, TX	---	238C2 or 238C3 or 238A
Howe, TX	237C3	237C2
Hugo, OK	238C2	294C2
Jacksboro, TX	299A	299A

CERTIFICATION

This Engineering Statement was prepared by the undersigned, a member of the staff of E. Harold Munn, Jr. & Associates, Inc., Broadcast Engineering Consultants, with offices at 100 Airport Drive, Coldwater, Michigan 49036-0220.

I hereby certify the contents of this Engineering Statement to be true and accurate to the best of my knowledge and belief. My qualifications are a matter of record before the Federal Communications Commission.

Dated this 2nd day of May, 1997

by Wayne S. Reese
Wayne S. Reese, President

E. Harold Munn, Jr. & Associates, Inc.
P. O. Box 220
Coldwater, MI 49036-0220

Phone: (517) 278-7339
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FIGURE 1

E. Harold Munn Jr. & Associates Inc.
P.O. Box 220 - Coldwater MI 49036

Proposed Class C2 Allocation Before Changes
KHYI - HOWE TEXAS Special Reference Point

REFERENCE
33 29 27 N
96 37 32 W

CLASS = C2
Current Spacings

DISPLAY DATES
DATA 01-31-97
SEARCH 02-06-97

----- Channel 237 - 95.3 MHz -----

Call	Channel	Location	Power	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.			HAAT			
KHYI	LI 237C3	Howe	TX	10.88	166.9	177.0	-166.12
33 23 43	96 35 56	CN	16.000 kW	126 M			
		Metro Broadcasters-Texas, Inc		BLH940429KA	941118		
KHYI.C	CP 237C3	Howe	TX	10.92	166.1	177.0	-166.08
33 23 43	96 35 50	CN	10.500 kW	156 M			
		Metro Broadcasters-Texas, Inc		BPH960703IA	961017		
AD237	AD 237A	Jacksboro	TX	146.29	258.4	166.0	-19.71
33 13 06	98 09 48		0.000 kW	0 M			
		Heftel Broadcasting Corp.		RM8854	960812		
KITX	LI 238C2	Hugo	OK	117.22	65.9	130.0	-12.78
33 54 56	95 28 04	CN	50.000 kW	150 M			
		BP Communications, Inc.		BLH890828KC	960930		
KWRDFM	LI 235C	Arlington	TX	105.00	197.8	105.0	0.00
32 35 22	96 58 10	CY	100.000 kW	460 M			
		Inspiration Media of Texas, I		BLH910506KF	970127		
KKAJFM	LI 239C1	Ardmore	OK	84.86	322.9	79.0	5.86
34 05 56	97 10 54	CN	100.000 kW	137 M			
		Chuckie Broadcasting Company		BLH6267	961218		
KABH.A	AP 236C	Shawnee	OK	197.89	6.5	188.0	9.89
35 15 47	96 22 43	CN	100.000 kW	306 M			
		Bott Broadcasting Company		BMPH951106IB	961018		
KFROFM	LI 237C3	Gilmer	TX	187.63	120.2	177.0	10.63
32 37 50	94 53 44	ZCN	5.900 kW	203 M			
		Curtis Broadcasting Stations,		BLH950814KG	960426		
KABH.C	CP 236C	Shawnee	OK	199.82	6.8	188.0	11.82
35 16 45	96 21 53	CN	100.000 kW	524 M			
		Bott Broadcasting Company		BPH851028MG	960801		
KMGZ.C	CP 237C3	Lawton	OK	208.99	305.8	177.0	31.99
34 34 36	98 28 30	ZCN	14.000 kW	95 M			
		Broadco of Texas, Inc.		BPH960111LG	960617		
KCKR	LI 238C	Waco	TX	224.42	193.4	188.0	36.42
31 31 16	97 10 26	CN	4.800 kW	55 M			
		Gulfstar Communications Waco		BLH961009KE	970113		
KMGZ.C	CP 237A	Lawton	OK	208.99	305.8	166.0	42.99
34 34 36	98 28 30	CN	6.000 kW	92 M			
		Broadco of Texas, Inc.		BPH890511MH	960212		
KDXE	LI 240A	Sulphur Springs	TX	102.34	111.4	55.0	47.34
33 09 07	95 36 12	CN	6.000 kW	87 M			
		Gilbert Group, Inc.		BMLH910214KA	960904		

FIGURE 2

E. Harold Munn Jr. & Associates Inc.
P.O. Box 220 - Coldwater MI 49036

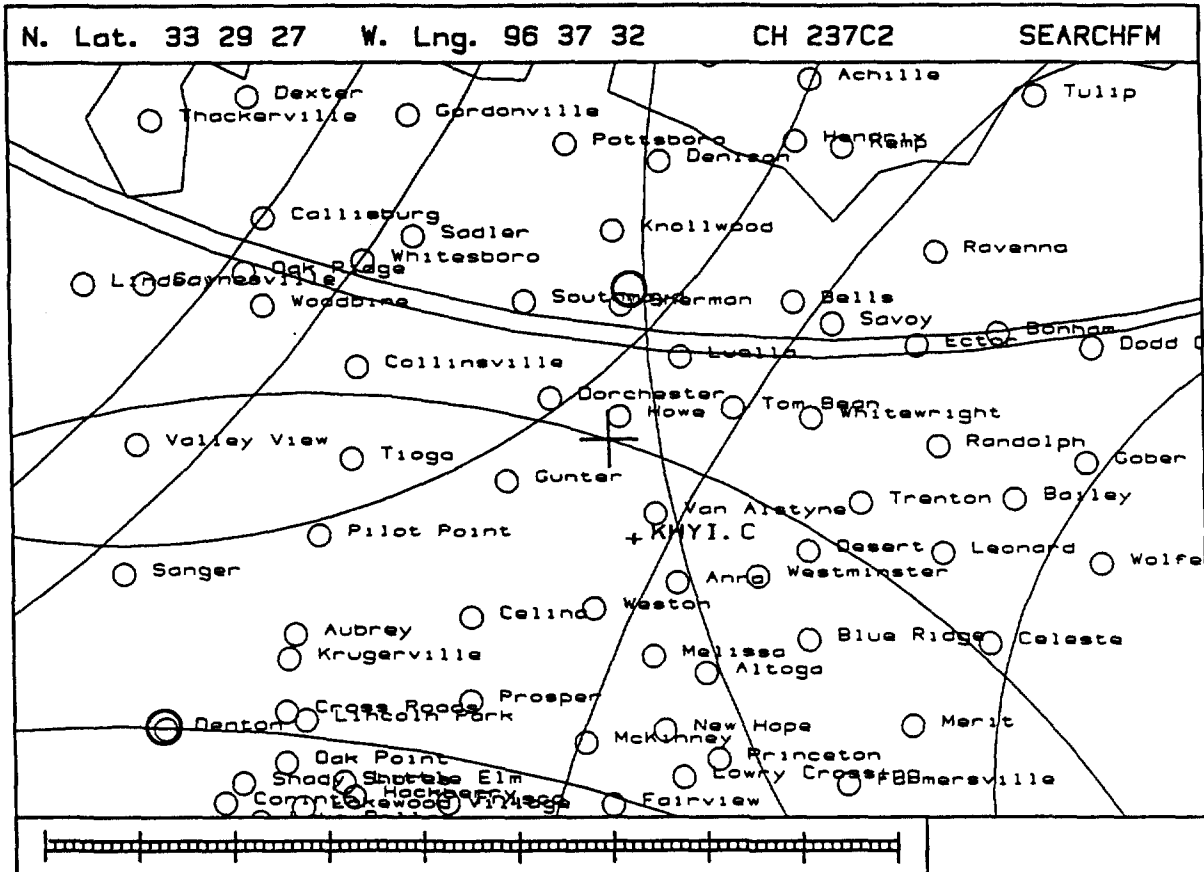
**Proposed Class C2 Allocation After Changes
KHYI - HOWE TEXAS Special Reference Point**

REFERENCE	CLASS = C2	DISPLAY DATES
33 29 27 N	Current Spacings	DATA 01-31-97
96 37 32 W		SEARCH 02-06-97
----- Channel 237 - 95.3 MHz -----		

Call	Channel	Location	Power	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.			HAAT			
KHYI	LI 237C3	Howe	TX	10.88	166.9	177.0	-166.12
33 23 43	96 35 56	CN	16.000 kW		126 M		
	Metro Broadcasters-Texas, Inc			BLH940429KA	941118		
KHYI.C	CP 237C3	Howe	TX	10.92	166.1	177.0	-166.08
33 23 43	96 35 50	CN	10.500 kW		156 M		
	Metro Broadcasters-Texas, Inc			BPH960703IA	961017		
KWRDFM	LI 235C	Arlington	TX	105.00	197.8	105.0	0.00
32 35 22	96 58 10	CY	100.000 kW		460 M		
	Inspiration Media of Texas, I			BLH910506KF	970127		
AD238	AD 238C2	Detroit	TX	135.19	81.6	130.0	5.19
33 39 32	95 11 00		0.000 kW		0 M		
	Metro Broadcasters-Texas, Inc			RM8968	970127		
	Site Restriction 7.68km east						
KKAJFM	LI 239C1	Ardmore	OK	84.86	322.9	79.0	5.86
34 05 56	97 10 54	CN	100.000 kW		137 M		
	Chuckie Broadcasting Company			BLH6267	961218		
KABH.A	AP 236C	Shawnee	OK	197.89	6.5	188.0	9.89
35 15 47	96 22 43	CN	100.000 kW		306 M		
	Bott Broadcasting Company			BMPH951106IB	961018		
	amended 961017						
KFROFM	LI 237C3	Gilmer	TX	187.63	120.2	177.0	10.63
32 37 50	94 53 44	ZCN	5.900 kW		203 M		
	Curtis Broadcasting Stations,			BLH950814KG	960426		
KABH.C	CP 236C	Shawnee	OK	199.82	6.8	188.0	11.82
35 16 45	96 21 53	CN	100.000 kW		524 M		
	Bott Broadcasting Company			BPH851028MG	960801		
KMGZ.C	CP 237C3	Lawton	OK	208.99	305.8	177.0	31.99
34 34 36	98 28 30	ZCN	14.000 kW		95 M		
	Broadco of Texas, Inc.			BPH960111LG	960617		
	One-Step Application from Channel 237A						
KCKR	LI 238C	Waco	TX	224.42	193.4	188.0	36.42
31 31 16	97 10 26	CN	4.800 kW		55 M		
	Gulfstar Communications Waco			BLH961009KE	970113		
	For Auxiliary Purposes Only						
KMGZ.C	CP 237A	Lawton	OK	208.99	305.8	166.0	42.99
34 34 36	98 28 30	CN	6.000 kW		92 M		
	Broadco of Texas, Inc.			BPH890511MH	960212		
	*To Channel 237C3 per One-Step Application BPH-960111LG						
KDXE	LI 240A	Sulphur Springs	TX	102.34	111.4	55.0	47.34
33 09 07	95 36 12	CN	6.000 kW		87 M		
	Gilbert Group, Inc.			BMLH910214KA	960904		

FIGURE 3

E. Harold Munn Jr. & Associates Inc. P.O. Box 220 - Coldwater MI 49036



**Proposed Class C2 Allocation After Changes
KHYI - HOWE TEXAS Special Reference Point**

Call	CH#	Location		D-KM	Azi	FCC	Margin
KHYI	237C3	Howe	TX	10.88	166.9	177.0	-166.12
KHYI.C	237C3	Howe	TX	10.92	166.1	177.0	-166.08
KWRDFM	235C	Arlington	TX	105.00	197.8	105.0	0.00
AD238	238C2	Detroit	TX	135.19	81.6	130.0	5.19
KKAJFM	239C1	Ardmore	OK	84.86	322.9	79.0	5.86
KABH.A	236C	Shawnee	OK	197.89	6.5	188.0	9.89
KFROFM	237C3	Gilmer	TX	187.63	120.2	177.0	10.63
KABH.C	236C	Shawnee	OK	199.82	6.8	188.0	11.82
KMGZ.C	237C3	Lawton	OK	208.99	305.8	177.0	31.99
KCKR	238C	Waco	TX	224.42	193.4	188.0	36.42
KMGZ.C	237A	Lawton	OK	208.99	305.8	166.0	42.99
KDXE	240A	Sulphur Spring	TX	102.34	111.4	55.0	47.34
KCKR	238C	Waco	TX	249.90	195.8	188.0	61.90
KHKS	291C	Denton	TX	105.00	197.8	35.0	70.00
KHKS	291C	Denton	TX	105.03	198.0	35.0	70.03

FIGURE 4

E. Harold Munn Jr. & Associates Inc.
P.O. Box 220 - Coldwater MI 49036

Proposed Class C2 Allocation Study
KITX - Hugo Oklahoma Present Site

REFERENCE
33 54 56 N
95 28 04 W

CLASS = C2
Current Spacings

DISPLAY DATES
DATA 01-24-97
SEARCH 01-30-97

----- Channel 294 - 106.7 MHz -----

Call	Channel	Location	Power	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.			HAAT			
AD294	AD 294C2	Detroit	TX	12.00	150.9	190.0	-178.00
33 49 16	95 24 16		0.000 kW	0 M			
		Great Plains Radiocasting		RM8968	961216		
KYNZ	LI 294A	Lone Grove	OK	168.00	282.8	166.0	2.00
34 14 09	97 14 48	CN	5.500 kW	104 M			
		S S S Communications, Inc.		BLH920611KB	920916		
KWSK	LI 295A	Daingerfield	TX	118.01	145.4	106.0	12.01
33 02 20	94 44 54	CN	1.100 kW	156 M			
		Robworthton Broadcasting		BLH911007KF	930107		
KKBI	LI 291C2	Broken Bow	OK	73.07	59.6	58.0	15.07
34 14 45	94 46 58	CN	17.000 kW	249 M			
		CarePhil Communications		BLH921013KB	940829		
KOOI	LI 293C	Jacksonville	TX	206.16	176.0	188.0	18.16
32 03 40	95 18 50	CN	100.000 kW	447 M			
		Waller Broadcasting, Inc.		BLH870416KB	880715		
KCMA.C	CP 293C3	Holdenville	OK	136.11	322.5	117.0	19.11
34 53 03	96 22 35	CN	25.000 kW	99 M			
		Hughes County Broadcasting		BPH960923IC	961202		
KRVAFM	LI 295A	Mckinney	TX	127.45	235.6	106.0	21.45
33 15 49	96 35 54	CN	3.900 kW	122 M			
		Radio Plano, Inc.		BLH960724KC	961025		
KHTT	LI 295C	Muskogee	OK	217.59	352.9	188.0	29.59
35 51 41	95 46 03	CY	100.000 kW	308 M			
		Renda Broadcasting Corporatio		BLH820914AJ	960925		
KCMA.A	AP 293C3	Holdenville	OK	147.18	319.2	117.0	30.18
34 54 50	96 31 20	CN	25.000 kW	100 M			
		Tyler Broadcasting Corporatio		BMPH961220IB	970115		
KLBC.A	AP 296A	Durant	OK	88.71	276.5	55.0	33.71
34 00 07	96 25 19	CN	5.100 kW	108 M			
		Durant Broadcasting Corporati		BMLH920203KB	961223		
		*To Channel 296C2 per D88-48					
KLBC	LI 296A	Durant	OK	88.71	276.5	55.0	33.71
34 00 07	96 25 19	CN	2.000 kW	108 M			
		Durant Broadcasting Corporati		BLH880819KF	961223		
KZXB.C	CPM 294C2	Homer	LA	233.69	123.3	190.0	43.69
32 44 39	93 22 53	CN	50.000 kW	140 M			
		NWLA Broadcasting Company		BMPH930430IB	961223		
KCMA	LI 293A	Holdenville	OK	151.82	326.9	106.0	45.82
35 03 24	96 22 49	CN	4.500 kW	62 M			
		Hughes County Broadcasting		BLH920323KA	961008		
KOMS	LI 297C	Poteau	OK	153.59	40.3	105.0	48.59
34 57 50	94 22 34	CN	100.000 kW	552 M			
		Leroy Billy		BLH851015KA	950117		
KMRTFM	LI 294C	Granbury	TX	303.34	233.1	249.0	54.34
32 15 07	98 02 48	CN	100.000 kW	302 M			
		KCVT-FM License Corporation		BLH900125KC	961231		

FIGURE 5

Page 1 of 2

E. Harold Munn Jr. & Associates Inc.
P.O. Box 220 - Coldwater MI 49036

Alternate Channel - Special Reference Point
Detroit Texas

REFERENCE

33 39 32 N

CLASS = C2

DISPLAY DATES

DATA 01-31-97

95 11 00 W

Current Spacings

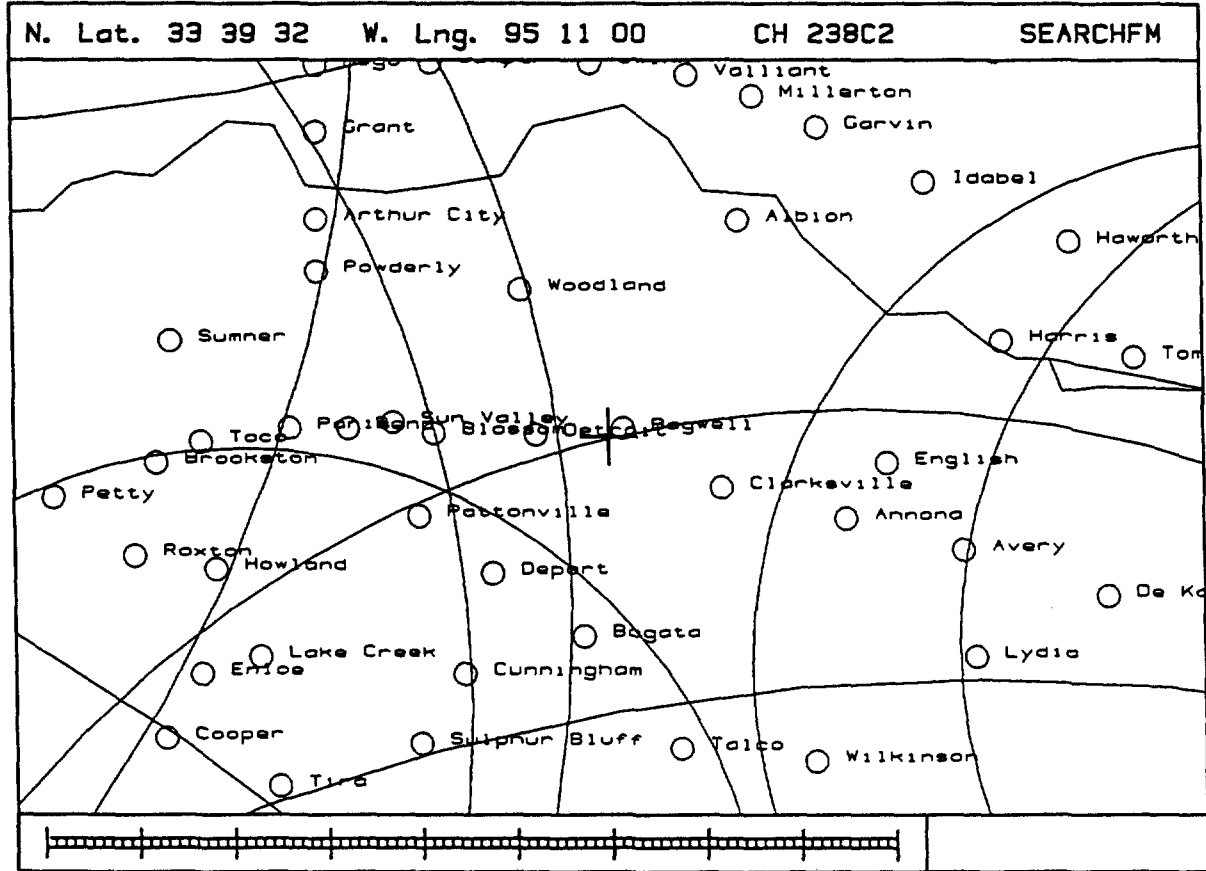
SEARCH 02-06-97

----- Channel 238 - 95.5 MHz -----

Call	Channel	Location	Power	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.			HAAT			
KFROFM LI	237C3	Gilmer	TX	117.16	166.7	117.0	0.16
32 37 50	94 53 44	ZCN	5.900 kW	203 M			
		Curtis Broadcasting Stations,		BLH950814KG	960426		
KHYI.P	237C2	Howe	TX	135.19	262.4	130.0	5.19
33 29 27	96 37 32		50.000 kW	150 M			
		Metro Broadcasters-Texas, Inc		BPH960703IA	961017		
KDXE LI	240A	Sulphur Springs	TX	68.47	214.8	55.0	13.47
33 09 07	95 36 12	CN	6.000 kW	87 M			
		Gilbert Group, Inc.		BMLH910214KA	960904		
KHYI LI	237C3	Howe	TX	134.71	257.8	117.0	17.71
33 23 43	96 35 56	CN	16.000 kW	126 M			
		Metro Broadcasters-Texas, Inc		BLH940429KA	941118		
KEWL.C CPM	236C3	New Boston	TX	75.05	109.0	56.0	19.05
33 26 15	94 25 11	CN	25.000 kW	99 M			
		Louis M. Basso III		BMPH941121IB	960730		
KAFXFM LI	238C1	Diboll	TX	252.71	171.0	224.0	28.71
31 24 28	94 45 53	CN	100.000 kW	173 M			
		Lovecom of Texas, Inc.		BLH860312KB	960816		
KKAJFM LI	239C1	Ardmore	OK	191.21	285.4	158.0	33.21
34 05 56	97 10 54	CN	100.000 kW	137 M			
		Chuckie Broadcasting Company		BLH6267	961218		
KLLI LI	240C3	Hooks	TX	95.55	103.3	56.0	39.55
33 27 25	94 10 59	ZCN	11.500 kW	148 M			
		Texarkana Broadcasting, Inc.		BLH930503KC	930816		
KWEN LI	238C	Tulsa	OK	293.62	343.8	249.0	44.62
36 11 46	96 05 53	CY	100.000 kW	405 M			
		Newcity Communications of Tul		BLH861021KD	871216		
KCKR LI	238C	Waco	TX	301.87	218.7	249.0	52.87
31 31 16	97 10 26	CN	4.800 kW	55 M			
		Gulfstar Communications Waco		BLH961009KE	970113		
KKBI LI	291C2	Broken Bow	OK	74.90	29.4	20.0	54.90
34 14 45	94 46 58	CN	17.000 kW	249 M			
		CarePhil Communications		BLH921013KB	940829		

FIGURE 5

E. Harold Munn Jr. & Associates Inc. P.O. Box 220 - Coldwater MI 49036



Alternate Channel - Special Reference Point
Detroit Texas

Call	CH#	Location		D-KM	Azi	FCC	Margin
KFROFM	237C3	Gilmer	TX	117.16	166.7	117.0	0.16
KHYI.P	237C2	Howe	TX	135.19	262.4	130.0	5.19
KDXE	240A	Sulphur Spring	TX	68.47	214.8	55.0	13.47
KHYI	237C3	Howe	TX	134.71	257.8	117.0	17.71
KEWL.C	236C3	New Boston	TX	75.05	109.0	56.0	19.05
KAFXFM	238C1	Diboll	TX	252.71	171.0	224.0	28.71
KKAJFM	239C1	Ardmore	OK	191.21	285.4	158.0	33.21
KLLI	240C3	Hooke	TX	95.55	103.3	56.0	39.55
KWEN	238C	Tulsa	OK	293.62	343.8	249.0	44.62
KCKR	238C	Waco	TX	301.87	218.7	249.0	52.87
KKBI	291C2	Broken Bow	OK	74.90	29.4	20.0	54.90

FIGURE 6

E. Harold Munn Jr. & Associates Inc.
P.O. Box 220 - Coldwater MI 49036

Alternate Channel - City Reference Point
Detroit Texas

REFERENCE
33 39 39 N
95 15 58 W

CLASS = C3
Current Spacings

DISPLAY DATES
DATA 01-31-97
SEARCH 02-06-97

----- Channel 238 - 95.5 MHz -----

Call	Channel	Location	Power	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.			HAAT			
KHYI.P	237C2	Howe	TX	127.62	261.8	117.0	10.62
33 29 27	96 37 32	CN	50.000 kW		150 M		
		Metro Broadcasters-Texas, Inc		BPH960703IA	961017		
KFROFM LI	237C3	Gilmer	TX	119.38	163.1	99.0	20.38
32 37 50	94 53 44	ZCN	5.900 kW		203 M		
		Curtis Broadcasting Stations,		BLH950814KG	960426		
KDXE LI	240A	Sulphur Springs	TX	64.57	209.0	42.0	22.57
33 09 07	95 36 12	CN	6.000 kW		87 M		
		Gilbert Group, Inc.		BMLH910214KA	960904		
KHYI LI	237C3	Howe	TX	127.26	256.9	99.0	28.26
33 23 43	96 35 56	CN	16.000 kW		126 M		
		Metro Broadcasters-Texas, Inc		BLH940429KA	941118		
KEWL.C CPM	236C3	New Boston	TX	82.42	107.3	43.0	39.42
33 26 15	94 25 11	CN	25.000 kW		99 M		
		Louis M. Basso III		BMPH941121IB	960730		
KKAJFM LI	239C1	Ardmore	OK	183.76	285.9	144.0	39.76
34 05 56	97 10 54	CN	100.000 kW		137 M		
		Chuckie Broadcasting Company		BLH6267	961218		
KAFXFM LI	238C1	Diboll	TX	254.25	169.2	211.0	43.25
31 24 28	94 45 53	CN	100.000 kW		173 M		
		Lovecom of Texas, Inc.		BLH860312KB	960816		
KWEN LI	238C	Tulsa	OK	291.35	345.2	237.0	54.35
36 11 46	96 05 53	CY	100.000 kW		405 M		
		Newcity Communications of Tul		BLH861021KD	871216		

FIGURE 7

E. Harold Munn Jr. & Associates Inc.
P.O. Box 220 - Coldwater MI 49036

Alternate Channel - City Reference Point
Detroit Texas

REFERENCE

33 39 39 N

95 15 58 W

CLASS = A

Current Spacings

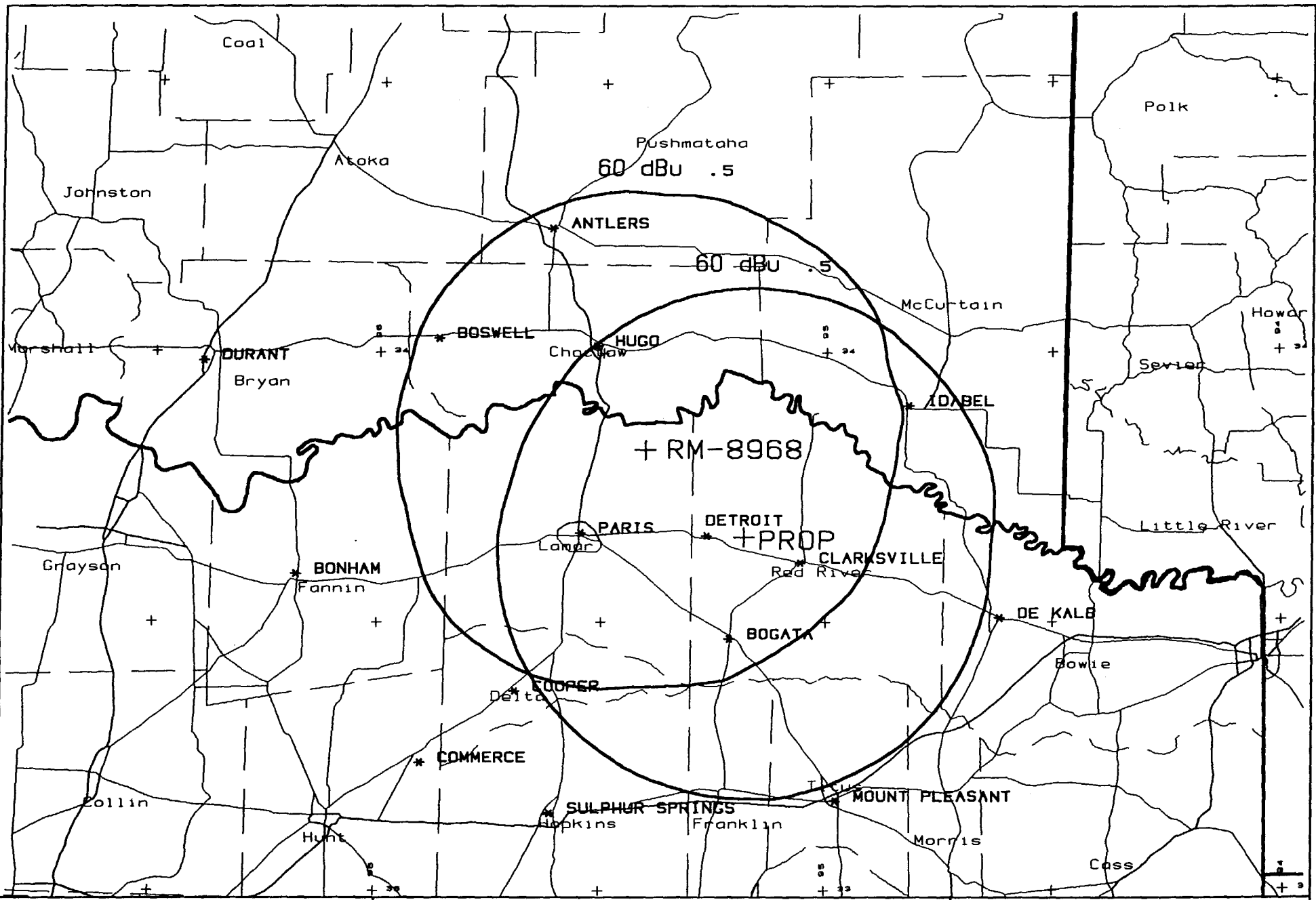
DISPLAY DATES

DATA 01-31-97

SEARCH 02-06-97

----- Channel 238 - 95.5 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.	Power	HAAT			
KHYI.P	237C2	Howe	TX	127.62	261.8	106.0
33 29 27	96 37 32	CN	50.000 kW	150 M		21.62
Metro Broadcasters-Texas, Inc			BPH960703IA	961017		
KFROFM LI	237C3	Gilmer	TX	119.38	163.1	89.0
32 37 50	94 53 44	ZCN	5.900 kW	203 M		30.38
Curtis Broadcasting Stations,			BLH950814KG	960426		
KDXE LI	240A	Sulphur Springs	TX	64.57	209.0	31.0
33 09 07	95 36 12	CN	6.000 kW	87 M		33.57
Gilbert Group, Inc.			BMLH910214KA	960904		
KHYI LI	237C3	Howe	TX	127.26	256.9	89.0
33 23 43	96 35 56	CN	16.000 kW	126 M		38.26
Metro Broadcasters-Texas, Inc			BLH940429KA	941118		
KEWL.C CPM	236C3	New Boston	TX	82.42	107.3	42.0
33 26 15	94 25 11	CN	25.000 kW	99 M		40.42
Louis M. Basso III			BMPH941121IB	960730		
KKAJFM LI	239C1	Ardmore	OK	183.76	285.9	133.0
34 05 56	97 10 54	CN	100.000 kW	137 M		50.76
Chuckie Broadcasting Company			BLH6267	961218		
KAFXFM LI	238C1	Diboll	TX	254.25	169.2	200.0
31 24 28	94 45 53	CN	100.000 kW	173 M		54.25
Lovecom of Texas, Inc.			BLH860312KB	960816		



Scale in km
 0 10 20 30 40 50 60 70

RM-8968 294C2 vs Counter-Proposal 238C2
 N. Lat. 33 49 16 W. Lng. 95 24 16

FIGURE 8 - DETROIT, TX
 MUNN & ASSOC. - 03/97

FIGURE 9

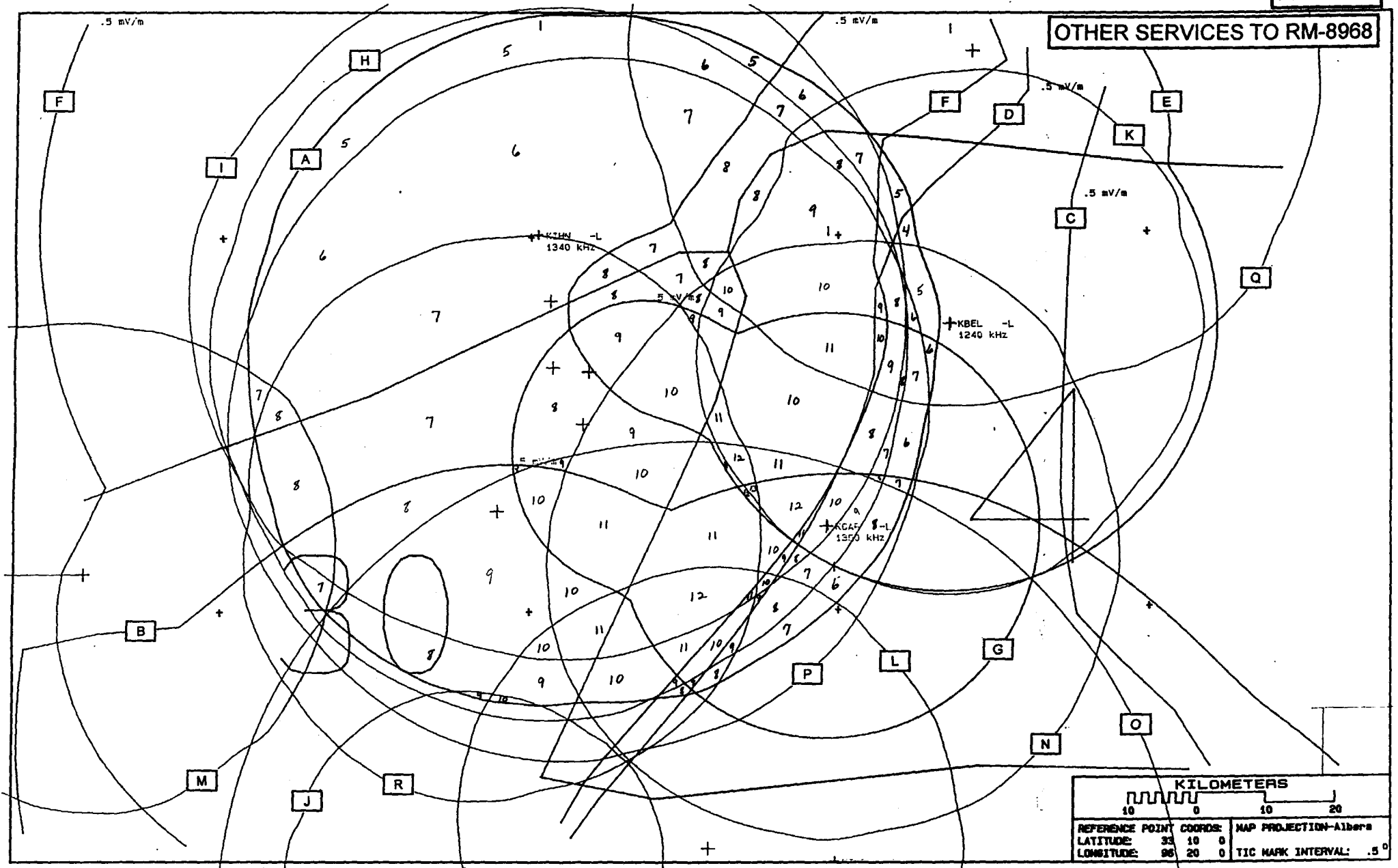


FIGURE 10**FACILITIES SHOWN IN OTHER SERVICES STUDY FOR CHANNEL 294C2****AM STATIONS**

<u>Station Identifier</u>	<u>Call Sign</u>	<u>Frequency (KHz)</u>	<u>Power (kW)</u>	<u>Pattern (DA/NDA)</u>	<u>North Latitude</u>	<u>West Longitude</u>	<u>City</u>	<u>State</u>
B	KIMP	960	1.0	NDA	33-09-54	95-00-27	Mount Pleasant	TX
C	KRLD	1080	50	NDA	32-53-25	96-38-44	Dallas	TX
D	KEOR	1110	5.0	DA	34-25-08	96-11-24	Atoka	OK
E	KBEL	1240	1.0	NDA	33-52-54	94-49-10	Idabel	OK
F	KIHN	1340	1.0	NDA	34-00-15	95-29-20	Hugo	OK
G	KCAR	1350	0.41	NDA	33-36-47	95-01-03	Clarksville	TX

FM STATIONS

<u>Station Identifier</u>	<u>Call Sign</u>	<u>Frequency (MHz)</u>	<u>ERP (kW)</u>	<u>HAAT (meters)</u>	<u>North Latitude</u>	<u>West Longitude</u>	<u>City</u>	<u>State</u>
A	294C2	106.7	50	150	33-49-16	95-24-16	Detroit	TX
H	KOYN	93.9	50	150	33-49-36	95-27-49	Paris	TX
I	KITX	95.5	50	150	33-54-56	95-28-04	Hugo	OK
J	KDXE	95.9	6.0	87	33-09-07	95-36-12	Sulphur Springs	TX
K	KBEL-FM	96.7	25.0	91	33-52-54	94-49-10	Idabel	OK
L	KALK	97.7	22.5	100	33-11-01	95-12-32	Winfield	TX
M	KFYZ-FM	98.3	25.0	83	33-33-16	96-13-24	Bonham	TX
N	KGAP	98.5	50	94	33-36-47	95-01-03	Clarksville	TX
O	KPXI	100.7	100	300	33-04-36	95-14-26	Mount Pleasant	TX
P	KBUS	101.9	50	150	33-45-04	95-24-51	Paris	TX
Q	KKBI	106.1	17.0	249	34-14-45	94-46-58	Broken Bow	OK
R	KPLT-FM	107.7	35	92	33-38-07	95-33-14	Paris	TX